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*Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

**DECLARATION OF GREGORY A. BRAY
IN SUPPORT OF MOTION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR AN
ORDER AUTHORIZING THE FILING OF
A SUPPLEMENTAL OBJECTION
UNDER SEAL**

[No Hearing Requested]

1 I, Gregory A. Bray, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am an attorney admitted to practice in the State of California and I am a partner
5 in the Financial Restructuring Group of the firm Milbank LLP ("Milbank"), counsel to the Official
6 Committee of Unsecured Creditors (the "Creditors' Committee") of the above-captioned debtors
7 and debtors in possession (collectively, the "Debtors"). Milbank maintains an office at, among
8 other places, 2029 Century Park East, 33rd Floor, Los Angeles, California, 90067-3019. There are
9 no disciplinary proceedings pending against me.

10 2. I am duly authorized to make this declaration on behalf of Milbank in support of
11 the *Motion of the Official Committee of Unsecured Creditors for an Order Authorizing the Filing*
12 *of a Supplemental Objection Under Seal*, filed concurrently herewith (the "Motion to Redact").
13 The facts set forth in this declaration are based upon my personal knowledge, my review of
14 relevant documents, or information provided to me by other advisors to the Creditors' Committee,
15 including other attorneys at Milbank. If called upon to testify, I would testify competently to the
16 facts set forth in this Declaration.

17 3. As stated, this declaration is submitted in support of the Motion to Redact, which
18 seeks authority to file under seal portions of the Creditors' Committee's supplemental objection
19 (the "Supplemental Objection") to the Debtors' *Motion Pursuant to 11 U.S.C. §§ 363 and 105(a)*
20 *and Fed. R. Bankr. P. 6004 Authorizing Debtors to Purchase Directors and Officers Insurance*
21 (the "D&O Motion") [Docket No. 2471], which supplemental objection is filed
22 contemporaneously herewith.

23 4. In particular, the Creditors' Committee took the deposition of Janaize Markland,
24 the Debtors' declarant in support of the D&O Motion, on July 3, 2019. The Debtors designated
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1 the transcript of the deposition as “confidential” pursuant to the *Order Governing Discovery by*
2 *and Among Debtors, Official Committee of Unsecured Creditors, and Official Committee of Tort*
3 *Claimants* entered by the Court on July 1, 2019 (“Protective Order”) [Docket No. 2807]. The
4 Protective Order governs the production, review, disclosure, and handling of any information
5 exchanged by and among the Official Committee of Tort Claimants (the “TCC”), the Creditors’
6 Committee, and the Debtors in these chapter 11 cases.
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8 I declare under penalty of perjury that the foregoing is true and correct to the best of my
9 knowledge and belief.
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11 Executed on July 5, 2019, Los Angeles, CA
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13 /s/ Gregory A. Bray
14 Gregory A. Bray
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